



THE LAW OFFICES OF  
**POLIZZOTTO &  
POLIZZOTTO, LLC**

**6911 18<sup>TH</sup> AVENUE  
BROOKLYN, NEW YORK 11204  
TELEPHONE (718) 232-1250  
FAX (718) 256-0966**

ALFRED POLIZZOTTO (1935-2001)  
ALFRED POLIZZOTTO III\*

EMILIO RODRIGUEZ

\*(ADMITTED NEW YORK, NEW JERSEY)

LONG ISLAND OFFICE  
1129 Northern Boulevard, Ste 404  
Manhasset, New York 11030

**VIA ELECTRONIC FILING**

The Honorable Gabriel W. Gorenstein  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**September 7, 2023**

**Re: Request for extension of discovery  
*Tyler Erdman v. Adam Victor, et al., No. 20 Civ. 4162***

Dear Judge Gorenstein,

This letter is written to request an extension of the discovery deadline, presently set for September 7, 2023, and for an extension of the deadline for the order required in the case management plan, presently set for September 14, 2023.

Paragraph 1.E of the Court's Individual Rules and Practices states requests for extensions of deadlines must state (1) the date or dates sought to be extended, (2) the number of previous requests for extensions, (3) the reason for the extension, and (4) whether the adversary objects and, if so, the reasons given by the adversary for objecting.

This is the eleventh request for an extension of the discovery deadline. The extension is needed due to the fact there presently exists a date for providing document production information occurring after the overall discovery deadline, and Plaintiff will need time to review the responses required by the Order of the Court dated August 25, 2023. I was finally able to

*PLEASE RESPOND TO BROOKLYN OFFICE*

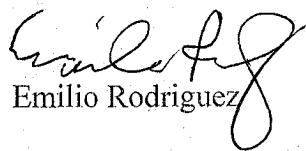
speak to the Plaintiff late this evening and was able to confirm he does not object, and in fact, joins me in the request for an extension.

This letter proposes a change of the discovery deadline from September 7, 2023, to October 23, 2023. This, in turn, affects the deadline for the order required by the case management plan, presently set for September 14, 2023. We propose changing it to October 30, 2023.

Therefore, Plaintiff and I make this joint request to extend the deadlines for discovery and the order required in the case management plan.

Yours faithfully,

**Polizzotto & Polizzotto, LLC**



Emilio Rodriguez